

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

TYLER DIVISION

STRAGENT, LLC, *et al.*,

Plaintiffs,

v.

**PIONEER ELECTRONICS (USA) INC.,
et al.,**

Defendants.

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Civil Action No. 6:11-CV-278-LED

JURY TRIAL DEMANDED

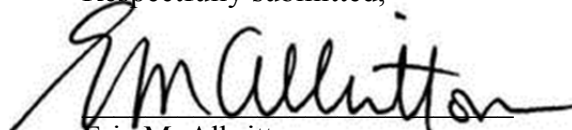
**JOINT MOTION TO DISMISS CLAIMS AND COUNTERCLAIMS
WITHOUT PREJUDICE UNDER FED. R. CIV. P. 41(a)(2) AND (c)**

Pursuant to Fed. R. Civ. P. 41(a)(2) and (c), Plaintiffs Stragent, LLC and TAG Foundation and Defendants Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Corporation (collectively “Toyota Defendants”) jointly move for dismissal WITHOUT PREJUDICE of all claims and counterclaims asserted by and between Plaintiffs and the Toyota Defendants in this action.

Plaintiffs and the Toyota Defendants will each bear their own costs, expenses and legal fees.

This dismissal does not affect any other named defendants.

Respectfully submitted,



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Toyota Motor Corporation***

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 3rd day of May 2012.


Eric M. Albritton